

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

TPC GROUP INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10493 (CTG)

Jointly Administered

**NOTICE OF APPEARANCE AND REQUEST  
FOR SERVICE PURSUANT TO FED. R. BANKR. P. 2002**

**PLEASE TAKE NOTICE** that an ad hoc group of noteholders that includes Bayside Capital, Inc. (“Bayside”) and Cerberus Capital Management, L.P. (“Cerberus,” and together with Bayside and other noteholders that may join the ad hoc group, the “Ad Hoc Group of Non-Consenting Noteholders”)<sup>2</sup> hereby appears by their counsel, Milbank LLP (“Milbank”) and Pachulski Stang Ziehl & Jones LLP (“PSZJ”). Milbank and PSZJ hereby enter their appearances pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and request that the undersigned be added to the official mailing matrix and service lists in these cases. Milbank and PSZJ request, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in these chapter 11 cases and copies of all papers served or required to be served in these chapter 11 cases, including but not limited to, all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules,

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: TPC Group Inc. (3618); TPC Holdings, Inc. (7380); TPC Group LLC (8313); Texas Butylene Chemical Corporation (7440); Texas Olefins Domestic International Sales Corporation (4241); TPC Phoenix Fuels LLC (9133); Port Neches Fuels, LLC (1641); and TP Capital Corp. (6248). Each Debtor’s corporate headquarters and mailing address is 500 Dallas St., Suite 2000, Houston, Texas 77002.

<sup>2</sup> The Ad Hoc Group of Non-Consenting Noteholders’ members currently include Bayside and Cerberus. Further entities or individuals may become members of the Ad Hoc Group of Non-Consenting Noteholders.

statements, chapter 11 plans, disclosure statements and all other matters arising herein or in any related adversary proceeding, be given and served upon the Ad Hoc Group of Non-Consenting Noteholders through service upon Milbank and PSZJ at the addresses, telephone, and facsimile numbers set forth below:

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**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, complaint or demand, motion, petition, pleading or request, and answering or reply papers filed in these cases, whether formal or informal, written or oral, and whether served, transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that this *Notice of Appearance and Request for Service Pursuant to Fed. R. Bankr. P. 2002* shall not be deemed or construed to be a waiver of any of the rights of the Ad Hoc Group of Non-Consenting Noteholders, including,

without limitation, to (i) have final orders in non-core matters entered only after *de novo* review by a higher court, (ii) trial by jury in any proceeding so triable in this case, or any case, controversy, or adversary proceeding related to this case, (iii) have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Ad Hoc Group of Non-Consenting Noteholders may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: June 1, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

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